1	LYSSA S. ANDERSON	
2	Nevada Bar No. 5781	
2	KRISTOPHER J. KALKOWSKI Nevada Bar No. 14892	
3	TRAVIS C. STUDDARD	
	Nevada Bar No. 16454	
4	KAEMPFER CROWELL	
5	1980 Festival Plaza Drive, Suite 650   Las Vegas, Nevada 89135	
3	Telephone: (702) 792-7000	
6	Fax: (702) 796-7181	
	landerson@kcnvlaw.com	
7	kkalkowski@kcnvlaw.com tstuddard@kcnvlaw.com	
8	studdard@kciiviaw.com	
O	Attorneys for Defendants	
9	Robert Leonard, and	
4.0	Las Vegas Metropolitan Police Department	
10	UNITED STATES	DISTRICT COURT
11		
	DISTRICT	OF NEVADA
12	   CARLOS GURRI, an individual,	Case No.: 2:25-cv-01102-JAD-DJA
13	CARLOS GORRI, all llidividual,	Case No.: 2.23-cv-01102-JAD-DJA
10	Plaintiff,	
14	vs.	STIPULATION AND ORDER
1.5	EDWARD PRECIADO an individual and	EXTENDING TIME TO ANSWER OR OTHERWISE RESPOND TO
15	EDWARD PRECIADO, an individual and former employee of the Federal Bureau of	PLAINTIFF'S COMPLAINT
16	Investigation, et al.	[ECF No. 1]
		(First Request)
17	Defendants.	
18	Defendants Las Vegas Metropolitan Pol	ice Department ("LVMPD") and Robert Leonard
19	("LVMPD Defendants") and Plaintiff, Carlo	os Gurri ("Plaintiff"), respectfully submit this
20	Stipulation and Order Extending Time to Answer or Otherwise Respond to Plaintiff's Complain	
21	(the "Stipulation"). This Stipulation is made in accordance with LR IA 6-1 and LR IA 6-2 of the	
22	Local Rules of this Court. This is the first request for an extension of time to file an answer of	
23	otherwise respond to Plaintiff's Complaint.	

Plaintiff filed his Complaint on May 29, 2025, [ECF No. 1, pg 18]. Clark County and

KAEMPFER CROWELL 1980 Festival Plaza Drive Suite 650 Las Vegas, Nevada 89135

24

1	Clark County District Attorney removed this case to Federal Court on June 20, 2025 [ECF No.
2	1]. LVMPD was served on June 2, 2025. Leonard was served on June 13, 2025. The current
3	deadline for LVMPD Defendants to respond to the Complaint is June 27, 2025. Counsel for
4	LVMPD Defendants has just been retained and requires some additional time to review the case
5	and prepare a responsive pleading.
6	Upon agreement by and between all the parties hereto as set forth herein, the undersigned
7	respectfully requests this Court grant an extension of time, up to and including Friday, July 11,
8	2025, for the LVMPD Defendants to file an answer or otherwise respond to Plaintiff's
9	Complaint. By entering into this Stipulation, none of the parties waive any rights they have
10	under statute, law or rule with respect to Plaintiff's Complaint.
11	DATED this <u>26th</u> day of June, 2025
12	KAEMPFER CROWELL SGRO & ROGER
13	By: /s/ Lyssa S. Anderson By: /s/ Alanna Bondy
14	LYSSA S. ANDERSON (5781) KRISTOPHER J. KALKOWSKI (14892) ANTHONY P. SGRO (3811) ALANNA C. BONDY (14830)
	TRAVIS C. STUDDARD (16454) NICHOLAS V. SCOTTÌ (15634)
	1980 Festival Plaza Drive # 650 2901 El Camino Avenue Suite 204
15	1980 Festival Plaza Drive, # 650  Las Vegas, Nevada 89135  Las Vegas, Nevada 89102
15 16	
	Las Vegas, Nevada 89135  Attorneys for Robert Leonard, and Las  Las Vegas, Nevada 89102  Attorneys for Plaintiff
16	Las Vegas, Nevada 89135  Attorneys for Robert Leonard, and Las Vegas Metropolitan Police Department  OLSON, CANNON & GORMLEY  By: /s/ Thomas D. Dillard, Jr.
16 17	Las Vegas, Nevada 89135  Attorneys for Robert Leonard, and Las Vegas Metropolitan Police Department  OLSON, CANNON & GORMLEY  By: /s/ Thomas D. Dillard, Jr. THOMAS D. DILLARD, JR. (6270) 9950 W. Cheyenne Ave.
16 17 18 19	Las Vegas, Nevada 89135  Attorneys for Robert Leonard, and Las Vegas Metropolitan Police Department  OLSON, CANNON & GORMLEY  By: /s/ Thomas D. Dillard, Jr. THOMAS D. DILLARD, JR. (6270)
16 17 18 19 20	Las Vegas, Nevada 89135  Attorneys for Robert Leonard, and Las Vegas Metropolitan Police Department  OLSON, CANNON & GORMLEY  By: /s/Thomas D. Dillard, Jr.  THOMAS D. DILLARD, JR. (6270) 9950 W. Cheyenne Ave. Las Vegas, NV 89128  Attorneys for Clark County and Clark  W. K. G. O. D.
16 17 18 19 20 21	Las Vegas, Nevada 89135  Attorneys for Robert Leonard, and Las Vegas Metropolitan Police Department  OLSON, CANNON & GORMLEY  By: /s/Thomas D. Dillard, Jr.  THOMAS D. DILLARD, JR. (6270) 9950 W. Cheyenne Ave. Las Vegas, NV 89128  Attorneys for Clark County and Clark
16 17 18 19 20	Las Vegas, Nevada 89135 Attorneys for Robert Leonard, and Las Vegas Metropolitan Police Department  OLSON, CANNON & GORMLEY  By: /s/ Thomas D. Dillard, Jr. THOMAS D. DILLARD, JR. (6270) 9950 W. Cheyenne Ave. Las Vegas, NV 89128  Attorneys for Clark County and Clark County District Attorney  Las Vegas, Nevada 89102 Attorneys for Plaintiff  Attorneys for ORDER  IT IS SO ORDERED.
16 17 18 19 20 21	Las Vegas, Nevada 89135  Attorneys for Robert Leonard, and Las Vegas Metropolitan Police Department  OLSON, CANNON & GORMLEY  By: /s/Thomas D. Dillard, Jr.  THOMAS D. DILLARD, JR. (6270) 9950 W. Cheyenne Ave. Las Vegas, NV 89128  Attorneys for Clark County and Clark  W. K. G. O. D.

KAEMPFER CROWELL 1980 Festival Plaza Drive Suite 650 Las Vegas, Nevada 89135

6943.337